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June 12, 2020

VIA ECF

Magistrate Judge Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Arriola et al v. ECCGP LLC et al
Case #: 1:19-cv-00849-FB-SMG

Your Honor,

We represent Plaintiffs in the above-named action. We submit the instant letter jointly with counsel for Defendants. On June 1, 2020, all parties attended a full-day mediation. The action did not settle. As a result, the parties respectfully request that completion of discovery deadlines be extended as follows:

1. Completion of fact discovery by:
 - a. Plaintiffs propose October 2, 2020;
 - b. Defendants propose January 10, 2021
2. Final pretrial conference on:
 - a. Plaintiffs propose October 20, 2020 at 10:00 A.M.
 - b. Defendants propose January 28, 2021

At the final pretrial conference, the parties shall be prepared to:

1. To state their respective positions on settlement, with PRINCIPALS WITH FULL SETTLEMENT DECISION-MAKING AUTHORITY (UP TO THE AMOUNT LAST DEMANDED FOR DEFENDANTS, DOWN TO THE AMOUNT LAST OFFERED FOR PLAINTIFFS) PRESENT OR AVAILABLE BY TELEPHONE THROUGHOUT THE CONFERENCE;
2. Be prepared to schedule disclosure of any expert reports and expert depositions;
3. To articulate the basis for any anticipated summary judgment motions and to be familiar with any pre-motion conference procedures required by the district judge presiding over the case; and,
4. To state whether they will agree to assignment of this case to a magistrate judge for all purposes, including jury trial and entry of final judgment.

Defendants request a settlement conference.

We thank the Court for the time and attention to this matter.

Respectfully submitted,

By: /s/ Clifford Tucker
Clifford Tucker, Esq.